

**SEALED**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**December 1, 2021**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: SAJ  
Deputy

**UNITED STATES OF AMERICA**

**Plaintiff**

**v.**

**(2) NATHAN DEON ANTHONY BENSON  
aka "HOLLYWOOD"**

**(5) ANGEL RANGEL  
aka "DANGER"**

**Defendants**

**Case No: SA-21-CR-00532-FB**

**INDICTMENT**

**COUNT 1: 21 U.S.C. §§ 846, 841(a)(1), &  
841(b)(1)(A); Conspiracy to Possess with  
Intent to Distribute Methamphetamine**

**COUNTS 2, 4, 6, 7: 21 U.S.C. §§ 841(a)(1) &  
(b)(1)(A); Possession with Intent to  
Distribute Methamphetamine**

**COUNT 3: 21 U.S.C. §§ 841(a)(1) &  
(b)(1)(A) & 18 U.S.C. § 2; Possession with  
Intent to Distribute Methamphetamine &  
Aiding and Abetting**

**COUNT 5: 18 U.S.C. § 922(g)(1); Felon in  
Possession of a Firearm**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[21 U.S.C. §§ 846, 841(a)(1), & 841(b)(1)(A)]**

That beginning on or about June 29, 2021, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas and the Northern District of Texas, Defendants,

**(2) NATHAN DEON ANTHONY BENSON aka "HOLLYWOOD"**

**(5) ANGEL RANGEL aka "DANGER"**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: possession with intent to distribute 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code Sections 846, 841(a)(1), & (b)(1)(A).

PENALTY ENHANCEMENT

Before the Defendant, [REDACTED], committed the offense charged in this count, [REDACTED] had a final conviction for a serious violent felony, namely Aggravated Robbery with a Deadly Weapon, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

PENALTY ENHANCEMENT

Before the Defendant, (2) NATHAN DEON ANTHONY BENSON, committed the offense charged in this count, (2) NATHAN DEON ANTHONY BENSON had a final conviction for a serious violent felony, namely Aggravated Robbery, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

PENALTY ENHANCEMENT

Before the Defendant, [REDACTED], committed the offense charged in this count, [REDACTED] had a final conviction for a serious drug felony, namely Possession with Intent to Deliver Methamphetamine PG1 4G-200G, under Texas Health and Safety Code, Section 481.112(D), for which he served more than 12 months of imprisonment, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT TWO

[21 U.S.C. §§ 841(a)(1) & (b)(1)(A)]

That on or about October 15, 2021, in the Western District of Texas, Defendants,

**(2) NATHAN DEON ANTHONY BENSON aka "HOLLYWOOD"**  
[REDACTED]

did knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A).

PENALTY ENHANCEMENT

Before the Defendant, (2) NATHAN DEON ANTHONY BENSON, committed the offense charged in this count, (2) NATHAN DEON ANTHONY BENSON had a final conviction for a serious violent felony, namely Aggravated Robbery, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

PENALTY ENHANCEMENT

Before the Defendant, [REDACTED], committed the offense charged in this count, [REDACTED] had a final conviction for a serious drug felony, namely Possession with Intent to Deliver Methamphetamine PG1 4G-200G, under Texas Health and Safety Code, Section 481.112(D), for which he served more than 12 months of imprisonment, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT THREE

[21 U.S.C. §§ 841(a)(1) & (b)(1)(A) & 18 U.S.C. § 2]

That on or about October 8 through October 11, 2021, in the Western District of Texas,  
Defendants,

[REDACTED]  
**(2) NATHAN DEON ANTHONY BENSON aka "HOLLYWOOD"**  
[REDACTED]

aided and abetted by each other, did knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A), and Title 18, United States Code, Section 2.

**PENALTY ENHANCEMENT**

Before the Defendant, [REDACTED], committed the offense charged in this count, [REDACTED] had a final conviction for a serious violent felony, namely Aggravated Robbery with a Deadly Weapon, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

**PENALTY ENHANCEMENT**

Before the Defendant, (2) NATHAN DEON ANTHONY BENSON, committed the offense charged in this count, (2) NATHAN DEON ANTHONY BENSON had a final conviction for a serious violent felony, namely Aggravated Robbery, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

**COUNT FOUR**

**[21 U.S.C. §§ 841(a)(1) & (b)(1)(A)]**

That on or about September 3, 2021, in the Western District of Texas, Defendant,

[REDACTED]  
did knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A).

**PENALTY ENHANCEMENT**

Before the Defendant, [REDACTED] committed the offense charged in this count, [REDACTED] had a final conviction for a serious violent felony, namely

Aggravated Robbery with a Deadly Weapon, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

**COUNT FIVE**  
**[18 U.S.C. § 922(g)(1)]**

That on or about September 3, 2021, in the Western District of Texas, Defendants,

[REDACTED]  
**(2) NATHAN DEON ANTHONY BENSON aka "HOLLYWOOD"**

knowing they had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: an APINTL-PAHRUMP NV ACP Philippines .38 Special Pistol, serial number RIA1857158, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIX**  
**[21 U.S.C. §§ 841(a)(1) & (b)(1)(A)]**

That on or about July 27, 2021, in the Western District of Texas, Defendant,

[REDACTED]

did knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A).

**PENALTY ENHANCEMENT**

Before the Defendant, [REDACTED] committed the offense charged in this count, [REDACTED] had a final conviction for a serious violent felony, namely Aggravated Robbery with a Deadly Weapon, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

**COUNT SEVEN**  
**[21 U.S.C. §§ 841(a)(1) & (b)(1)(A)]**

That on or about June 29, 2021, in the Western District of Texas, Defendant,

[REDACTED]  
did knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A).

**PENALTY ENHANCEMENT**

Before the Defendant, [REDACTED] committed the offense charged in this count, [REDACTED] had a final conviction for a serious violent felony, namely Aggravated Robbery with a Deadly Weapon, under Texas Penal Code, Section 29.03, for which he served more than 12 months of imprisonment.

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Drug Violations and Forfeiture Statutes**

**[Title 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A), subject to forfeiture pursuant to Title 21 U.S.C. § 853(a)(1) and (2)]**

As a result of the criminal violations set forth in Counts One through Four, Six, and Seven, the United States gives notice to the Defendants of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which states:

**Title 21 U.S.C. § 853. Criminal forfeitures**

**(a) Property subject to criminal forfeitures.**

Any person convicted of a violation of this subchapter or subchapter II punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

II.

**Firearms Violations and Forfeiture Statutes**

**[Title 18 U.S.C. § 922(g)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),  
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth in Count Five, the United States gives notice to the Defendants of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 924. Penalties**

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922. . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties:

- APINTL-PAHRUMP NV ACP Philippines .38 Special Pistol, serial number RIA1857158;
- Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY:

  
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FOR BRIAN NOWINSKI  
Assistant United States Attorney